

AO 91 (Rev. 08/09) Criminal Complaint

SEALED

FILED

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

DEC 11 2024

Heldi D. Campbell, Clerk
U.S. DISTRICT COURT

United States of America

v.

JESSICA JANAY BALDWIN

Defendant(s)

Case No.

FILED UNDER SEAL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 7, 2024 in the county of Tulsa in the
Northern District of Oklahoma, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. §§ 846, 841(b)(1)(B)(vi),
and 841(b)(1)(B)(viii)Conspiracy to possess with intent to distribute a mixture or substance
containing 40 grams or more of fentanyl and 50 grams or more of
methamphetamine

This criminal complaint is based on these facts:

See Attached Affidavit by

☒ Continued on the attached sheet.
Complainant's signatureSA Kyle Boeck, FBI
Printed name and title

Sworn to before me by phone.

Date: 12/11/24
Judge's signatureCity and state: Tulsa, OKJodi F. Jayne, U.S. Magistrate Judge
Printed name and title

**Affidavit in Support of an Arrest Warrant
in the Northern District of Oklahoma**

I, Kyle Boeck, being duly sworn under oath, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since December 2022. My duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of Federal laws, to include Title 21, United States Code, Section 846 (Drug Conspiracy).

2. Through my training, education, and experience, I have become familiar with the manner in which individuals involved in public corruption and drug related crimes operate, and the efforts of those involved in such activity to avoid detection by law enforcement. I know, based upon my training and experience, as well as information relayed to me during the course of my official duties, that criminals involved in public corruption and drug related crimes, routinely use a variety of different methods and platforms to communicate relating to their criminal activity, including but not limited to wire and electronic communication facilities, including multiple cellular telephones, public telephones, the internet, including email, social media networks and applications (e.g. Facebook Messenger, Pinger, CashApp).

3. The facts and statements in this affidavit are based in part on information provided by other law enforcement officers and on my personal observations and training and experience as a Special Agent for the FBI. This affidavit is intended to

show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit is submitted in support of an application by the United States for a federal complaint and arrest warrant for **Jessica Janay BALDWIN** (DOB: XX/XX/1983) and **Michael Ray CRAWLEY** (DOB: XX/XX/1978), for a violation of Title 21, United States Code, Sections 846, 841(b)(1)(B)(vi), and 841(b)(1)(B)(viii)—specifically, conspiracy to possess with intent to distribute a mixture or substance containing 40 grams or more of fentanyl and 50 grams or more of methamphetamine, Schedule II controlled substances.

PROBABLE CAUSE

5. On April 7, 2024, McIntosh County Sheriff's Office Deputy Christian Degraffenreid pulled over a black car driven by **CRAWLEY** after observing multiple traffic infractions. The traffic stop occurred off I-40 near mile marker 267, in the Eastern District of Oklahoma. **BALDWIN** was the only passenger in the vehicle. While conducting the traffic investigation and speaking with **BALDWIN** and **CRAWLEY**, Deputy Degraffenreid smelled the odor of marijuana and subsequently searched the vehicle. He found suspected drugs and drug paraphernalia, to include oxycodone blue circle pills, white crystal-like substance, white powder-like substance, five black cylinders wrapped in electrical tape, marijuana, white bar pills, a digital scale, a methamphetamine pipe, and \$1,976 in cash.

6. After advising **BALDWIN** and **CRAWLEY** of their rights, they agreed to speak. Degraffenreid learned that **BALDWIN** intended to bring the suspected drugs into the prison where **BALDWIN** worked in McAlester, Oklahoma. **BALDWIN** stated they picked up the drugs in Tulsa, Oklahoma, in the Northern District of Oklahoma, on multiple occasions. **CRAWLEY'S** role was to drive **BALDWIN** to Tulsa to pick up the drugs. **BALDWIN** and **CRAWLEY** stated they made between \$400 and \$500 per cylinder of drugs. **CRAWLEY** continuously stated that Degraffenreid had "hit the load of a lifetime."

7. **BALDWIN** was subsequently confirmed to be an employee with the Oklahoma State Penitentiary in McAlester, Oklahoma. The illegal narcotics, suspected drugs, paraphernalia, and **BALDWIN'S** Apple iPhone 13 cell phone were seized. **BALDWIN** was arrested and charged in McIntosh County District Court with various drug trafficking offenses. **BALDWIN** has since been terminated from her employment at the prison.

8. OSBI tested the seized drugs and detected the following controlled substances:

Narcotic	Description	Weight	Schedule
Fentanyl	Multiple round blue M30 tablets and white powder	43.01g +/- 0.16g	II
Methamphetamine	Crystal-like substance, white powder	218.01g +/- 0.32g	II
Methamphetamine & Fentanyl	Gray powder	0.81g +/- 0.08g	II
Marijuana	Green leafy substance	233.88g (gross)	I

Alprazolam	Multiple pieces of white rectangular tablets marked GG249	1.11g (gross)	IV
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9. On April 9, 2024, I interviewed **BALDWIN** at the McIntosh County Jail with Oklahoma Department of Corrections (DOC) Office of Inspector General Agent Kyle Jones. After advising **BALDWIN** about her rights, she agreed to speak. **BALDWIN** stated she had been solicited by prison inmate Co-Conspirator 1 (“CC1”) to bring contraband into the prison on CC1’s behalf. Agent Jones showed her a photograph of a female. **BALDWIN** stated the female in the photo appeared to be a person with whom **BALDWIN** met in Tulsa on CC1’s behalf, including just hours before her and **CRAWLEY’S** arrests. Based on information provided by DOC, the photograph depicted Co-Conspirator 2 (“CC2”), one of CC1’s frequent visitors from outside of prison.

10. CC1 was previously incarcerated at the Oklahoma State Penitentiary in McAlester and is currently incarcerated in Lawton Correctional and Rehabilitation Facility in Lawton. CC1 is serving a life sentence for first degree murder from a Tulsa County District Court conviction. CC1 was also previously convicted of various drug trafficking and witness tampering charges in two other Tulsa County District Court cases. Based on DOC records, CC1 is a validated member of the Security Threat Group Neighborhood Crips in Tulsa, Oklahoma.

11. On April 9, 2024, District Attorney Investigator Kevin Branscum extracted **BALDWIN'S** Apple iPhone 13 pursuant to a State of Oklahoma search warrant and provided me with a copy of the extraction on April 16.

12. The following text messages excerpts depict the coordination of the pick-up of drugs on April 6 in Tulsa between CC2, **BALDWIN**, and **CRAWLEY**, as well as a message CC2 sent after **BALDWIN** and **CRAWLEY'S** arrest:

Date/Time	Participants	Message Content
4/6/2024 at 2:26:52 PM (UTC-5)	From: CC2 To: BALDWIN	"Hello, Can you be here by 4-430 ish"
4/6/2024 at 2:29:39 PM (UTC-5)	From: BALDWIN To: CRAWLEY	"Oh girl just asked if we could be there by 430 ish and I said the earliest would probably be around 530ish"
4/6/2024 at 6:02:46 PM (UTC-5)	From: BALDWIN To: CC2	"725 is my eta if so"
4/6/2024 at 7:54:39 PM (UTC-5)	From: CC2 To: BALDWIN	"Ok at Jason"
4/7/2024 at 10:17:42 PM (UTC-5)	From: CC2 To: BALDWIN	"Hey I'm sorry to let you know praying you didn't spend any money they packed [CC1's] stuff up and supposedly moving I'm gone need everything back"

13. I reviewed **BALDWIN'S** cell phone extraction and found relevant text message conversations with **BALDWIN** from three separate telephone numbers associated with the Pinger, Inc. messaging application: 262-944-6249, 972-688-0408, and 405-901-6076. Based on federal subpoenas and search warrants issued in the Northern District of Oklahoma, Pinger provided that 262-944-6249, 972-688-0408, and 405-901-6076 are used by the application TextFree. The application was

developed and published by Pinger. Use of the TextFree App allows Android and iOS Wi-Fi enabled devices to be used to make free telephone calls as well as to send and receive text messages. TextFree also allows users to choose their own phone number.

14. Pinger further provided information indicating that the telephone numbers 262-944-6249 and 405-901-6076 were associated with Pinger Account ID 1095719665, which was associated with CC2's email address. The telephone number 972-688-0408 was associated with Pinger Account ID 1650852597, which was registered to CC1's middle and last names.

15. Pursuant to a federal search warrant issued in the Northern District of Oklahoma, the FBI performed an enhanced extraction of **BALDWIN'S** iPhone that revealed additional relevant information. Among these was geolocation information confirming that **BALDWIN** traveled to the area of Jason's Deli at 61st and Memorial in Tulsa, Oklahoma on April 6 prior to her arrest. In addition, there were Facebook messages between CC1 and **BALDWIN** on April 6 regarding that drug transaction. The pertinent Facebook messages are as follows:

Date/Time	Participants	Message Content
4/6/2024 at 2:19:23 PM (UTC+0)	From: CC1 To: BALDWIN	"I'll have everything wrapped today"
4/6/2024 at 2:19:35 PM (UTC+0)	From: BALDWIN To: CC1	"2 or 4"
4/6/2024 at 2:19:48 PM (UTC+0)	From: CC1 To: BALDWIN	"4"
4/6/2024 at 2:19:57 PM (UTC+0)	From: CC1 To: BALDWIN	"Or can I do 5 this time"

4/6/2024 at 2:20:12 PM(UTC+0)	From: CC1 To: BALDWIN	"2500"
4/6/2024 at 2:20:24 PM(UTC+0)	From: BALDWIN To: CC1	"Five for 2750"
4/6/2024 at 2:59:10 PM (UTC+0)	From: CC1 To: BALDWIN	"I'ma do the five pieces for \$2750"
4/6/2024 at 6:23:34 PM (UTC+0)	From: CC1 To: BALDWIN	"Would you be able to come today?"
4/6/2024 at 6:25:55 PM (UTC+0)	From: BALDWIN To: CC1	"Yes when"
4/6/2024 at 6:26:55 PM (UTC+0)	From: CC1 To: BALDWIN	Audio message sent by CC1 referencing a time to meet with CC1's "girl."
4/6/2024 at 6:27:23 PM (UTC+0)	From: BALDWIN To: CC1	"Ok"

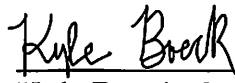
16. Based on federal subpoenas issued to City National Bank regarding CC2's bank account ending in -9537, I reviewed bank records and surveillance footage showing CC2 withdrawing \$5,000 on April 3, 2024, from her bank located at the Lewis branch, corresponding to a Walmart location at 2019 East 81st Street in Tulsa, Oklahoma. These bank statements further show a history and pattern of large deposits into this account from various CashApp accounts as well as large cash withdrawals. Accordingly, there is probable cause to believe that CC2 used a portion of this money at CC1's direction to pay **BALDWIN** the \$1,976 seized during **BALDWIN** and **CRAWLEY'S** arrest.

CONCLUSION

Based on the information set forth in this affidavit, I submit there is probable cause to believe that **Jessica Janay BALDWIN** and **Michael Ray CRAWLEY** have

violated Title 21, United States Code, Sections 846, 841(b)(1)(B)(vi), and 841(b)(1)(B)(viii)—specifically, conspiracy to possess with intent to distribute a mixture or substance containing 40 grams or more of fentanyl and 50 grams or more of methamphetamine, Schedule II controlled substances.

Respectfully submitted,



Kyle Boeck, Special Agent
Federal Bureau of Investigation

Subscribed and sworn via phone on the 11th day of December, 2024.



JODI F. JAYNE
UNITED STATES MAGISTRATE JUDGE